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20 ATTORNEYS FOR DEFENDANTS JINGIT
21 LLC, JINGIT HOLDINGS, LLC, JINGIT
22 FINANCIAL SERVICES, LLC, TODD ROOKE,
23 JOE ROGNESS, SAM ASHKAR, PHIL HAZEL,
24 HOLLY OLIVER, SHANNON DAVIS, JUSTIN
25 JAMES, CHRIS OHLSEN, DAN FRAWLEY,
26 DAVE MOOREHOUSE, II, TONY ABENA,
27 CHRIS KARLS, JOHN E. FLEMING, AND
28 MUSIC.ME, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Indiezone, Inc., a Delaware corporation, and EoBuy,
Limited an Irish private limited company,

Plaintiffs,

vs.

Todd Rooke, Joe Rogness, Phil Hazel, Sam Ashkar,
Holly Oliver and U.S. Bank, collectively the ***RICO***
Defendants;

Jingit LLC, Jingit Holdings, LLC, Jingit Financial
Services LLC., Music.Me, LLC., Tony Abena, John
E. Fleming, Dan Frawley, Dave Moorehouse II,
Chris Ohlsen, Justin James, Shannon Davis, Chris
Karls in their capacities as officers, agents and/or

Case No: 13-cv-04280-VC

**JINGIT DEFENDANTS' OBJECTIONS
TO PLAINTIFFS' EXHIBIT LIST**

employees of Jingit LLC, ***Defendants in Negligence, and Aiding/Abetting;***

Wal-Mart, General Electric, Target, DOE(s) and ROE(s) 1 through 10, ***Defendants in Negligence Secondary-Vicarious Infringement,***

Defendants.

On June 6, 2014, the Court issued an Order Setting Evidentiary Hearing (Docket No. 113) on the Jingit Defendants’¹ Motion for Sanctions. Among other things, the Order required the parties to file exhibit lists and also exchange exhibits by July 17, 2014 and to file objections to exhibits by July 31, 2014. On July 17, 2014, Plaintiffs filed a “Response to the Order of the Court for Production of Documents and a List of Witnesses and Testimony on Evidentiary Hearing For Sanctions” (Docket No. 124), which included a list of witnesses to appear “by live video feed” and identified four documents on an exhibit list: three exhibits were “to be provided” and the fourth exhibit was “Attached Exhibit ‘B [sic]” purporting to be the “2008-2014 Corporate Book issued by Irish Registry Corporate Registry.” Plaintiffs’ simultaneous Docket No. 124-1 filing then provided placeholder pages for “Exhibit ‘A’ (to be provided),” “Exhibit ‘B’ (to be provided),” and “Exhibit ‘D’ (to be provided)” and provided a copy of “Exhibit ‘C’” attaching the Memorandum and Articles of Association of EoBuy Licencing Limited. Also on July 17, 2014, Plaintiffs filed an Opposed Motion for an Enlargement of Time to File Exhibit List and Witness List for Evidentiary Hearing and Motion for Video Appearance by Plaintiffs[’] Witnesses for Evidentiary Hearing with the supporting Declaration of Douglas R. Dollinger (Docket Nos. 128 & 128-1). In a July 18, 2014 Text Order (Docket No. 129), the Court denied Plaintiffs’ Motions and Ordered Plaintiffs to file their

¹ “Jingit Defendants” are Todd Rooke, Joe Rogness, Phil Hazel, Sam Ashkar, Holly Oliver, Jingit, LLC, Jingit Holdings, LLC, Jingit Financial Services, LLC, Music.Me, LLC, Tony Abena, John E. Fleming, Dan Frawley, Dave Moorehouse II, Chris Ohlsen, Justin James, Shannon Davis and Chris Karls.

1 exhibit and witness lists by Monday, July 21 “or the Court will consider additional sanctions.” To
 2 date, Plaintiffs have not made any additional filings or provided any additional witness list, exhibit
 3 list, or copies of exhibits to the Court or to the Jingit Defendants.

4 The Jingit Defendants hereby object to all of Plaintiffs’ Exhibits identified on Plaintiffs’ July
 5 17, 2014 exhibit list with the exception of Plaintiffs’ “Exhibit ‘C’” Memorandum and Articles of
 6 Association of eoBuy Licencing Limited provided at Docket No. 124-1. With the exception of the
 7 aforementioned Exhibit C, to date Plaintiffs have not provided to the Jingit Defendants copies of any
 8 other exhibits, including any of the “to be provided” exhibits identified by Plaintiffs on July 17, 2014
 9 (Docket Nos. 124 & 124-1), in contravention of the Court’s Orders (Docket Nos. 113 and 129).
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11 Respectfully Submitted,

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 13 Dated: July 31, 2014

MASLON EDELMAN BORMAN & BRAND, LLP

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 15 By: s/ Keiko L. Sugisaka
 16 Keiko L. Sugisaka, MN Bar No. 266152
 (Pro hac vice)

17 **ATTORNEYS FOR DEFENDANTS JINGIT LLC,**
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